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2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 -----X
5 Estate of VALERIE YOUNG, by VIOLA YOUNG,
6 as Administratrix of the Estate of
7 Valerie Young, and in her personal
8 capacity, SIDNEY YOUNG, and LORETTA
9 YOUNG LEE,
10 Plaintiffs,
11 Index No.:
12 vs. 07CV6241

13 STATE OF NEW YORK OFFICE OF MENTAL
14 RETARDATION AND DEVELOPMENTAL
15 DISABILITIES, PETER USCHAKOW,
16 personally and in his official
17 capacity, JAN WILLIAMSON, personally
18 and in her official capacity, SURESH
19 ARYA, personally and in his official
20 capacity, KATHLEEN FERDINAND,
21 personally and in her official
22 capacity, GLORIA HAYES, personally and
23 in her official capacity, DR. MILOS,
24 personally and in his official capacity,
25 Defendants.

-----X
April 7, 2008
10:11 a.m.

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18 Examination before trial of KATHLEEN
19 A. FERDINAND, held at the offices of The
20 Catafago Law Firm, P.C., 350 Fifth Avenue,
21 New York, New York, pursuant to Notice,
22 before Wendy D. Boskind, a Registered
23 Professional Reporter and Notary Public
24 of the State of New York.

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2 A P P E A R A N C E S:

3

4 THE CATAFAGO LAW FIRM, P.C.

5 Attorneys for Plaintiffs

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9 BY: JACQUES CATAFAGO, ESQ.

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11

12 STATE OF NEW YORK

13 OFFICE OF THE ATTORNEY GENERAL

14 ANDREW M. CUOMO

15 Attorneys for Defendants

16 120 Broadway

17 New York, New York 10271-0332

18 BY: JOSE L. VELEZ, ESQ.

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20

21 ALSO PRESENT:

22 PATRICIA PAWLOWSKI, ESQ.

23 Counsel's Office

24 Office of Mental Retardation

25 and Developmental Disabilities

1 Ferdinand

2 that the consumer is in need of services.

3 Q. Do you know whether you have
4 ever seen such a certification in
5 connection with Valerie Young?

6 A. Yeah, I've seen it.

7 MR. CATAFAGO: I don't
8 believe it was produced.

9 MR. VELEZ: It would be in
10 the medical records.

11 A. It would be in the actual
12 medical records.

13 MR. VELEZ: We produced the
14 full medical records.

15 Q. And if it's not in the full
16 medical records, it doesn't exist?

17 A. No, those -- they do that
18 certification every year, the doctor
19 signs it, so it has to be there.

20 Q. What is the "UR 3" referred
21 to in item 6?

22 A. I have no idea what the "UR
23 3" is.

24 Q. Let me finish the questions.

25 MR. VELEZ: Frankly, counsel,